

Fact Sheet



For Final Minor Modification Permitting Action Under 45CSR30 and Title V of the Clean Air Act

This Fact Sheet serves to address the changes specific to this Minor Modification, and shall be considered a supplement to the Fact Sheet corresponding with the Title V operating permit issued on December 18, 2018.

Permit Number: **R30-06100016-2018**

Application Received: **June 7, 2019**

Plant Identification Number: **03-54-06100016**

Permittee: **The Monongalia County Coal Company**

Facility Name: **Monongalia County Preparation Plant**

Mailing Address: **P.O. Box 24, Wana, WV 26590**

Permit Action Number: *MM01* Revised: *February 25, 2020*

Physical Location:	Wana, Monongalia County, West Virginia
UTM Coordinates:	560.47 km Easting • 4395.78 km Northing • Zone 17
Directions:	Approximately 1/2 mile NE of Wana and State Route 7 on County Road 12/2

Facility Description

The facility is a coal preparation plant that includes a 115 mmBTU/hr coal-fired thermal dryer and coal handling facility consisting of a wet wash plant with associated coal handling equipment. Facility SIC code is 1222.

Proposed Modification

This permitting action will delete certain emission units (section 1.1.) and the initial visible emissions evaluation (current permit condition 4.2.2.a.) to reflect changes permitted in NSR Class I Administrative Update Permit R13-0718G. There are no changes in potential or actual emissions for this action.

Emissions Summary

The emissions associated with proposed changes are provided in the following table.

Plantwide Emissions Summary [Tons per Year]			
Regulated Pollutants	PTE^a	MM01 Change^b	Proposed PTE
Carbon Monoxide (CO)	103.0	0	103.0
Nitrogen Oxides (NO _x)	136.31	0	136.31
Particulate Matter (PM _{2.5})	505.16	0	505.16
Particulate Matter (PM ₁₀)	505.16	0	505.16
Total Particulate Matter (TSP)	1,644.04	0	1,644.04
Sulfur Dioxide (SO ₂)	249.4	0	249.4
Volatile Organic Compounds (VOC)	129.25	0	129.25
Hazardous Air Pollutants	PTE^a	MM01 Change	Proposed PTE
Hydrogen Fluoride (HF)	2.0	0	2.0
Hydrochloric Acid (HCl)	2.6	0	2.6
Total HAPs	4.7	0	4.7

^a Potential emissions (PTE) are from the Fact Sheet accompanying renewal operating permit R30-06100016-2018.

^b Though this modification removes source IDs 042 (Raw Coal Stockpile 2) and 048 (Lime Storage Silo 1) from the permit, the associated decrease in potential emissions of particulate matter were accounted for in the 2018 renewal operating permit because the sources were either inactive or not present at the facility at the time of renewal application submittal (according to 12/11/2019 technical correspondence from the permittee).

Title V Program Applicability Basis

With the proposed changes associated with this modification, this facility maintains the potential to emit 103.0 tpy of CO; 136.31 tpy of NO_x; 505.16 tpy of PM₁₀; 249.4 tpy of SO₂; and 129.25 tpy of VOC. Due to this facility's potential to emit over 100 tons per year of criteria pollutant, The Monongalia County Coal Company's Monongalia County Preparation Plant is required to have an operating permit pursuant to Title V of the Federal Clean Air Act as amended and 45CSR30.

Legal and Factual Basis for Permit Conditions

The State and Federally-enforceable conditions of the Title V Operating Permits are based upon the requirements of the State of West Virginia Operating Permit Rule 45CSR30 for the purposes of Title V of the Federal Clean Air Act and the underlying applicable requirements in other state and federal rules.

The modification to this facility has been found to be subject to the following applicable rules:

Federal and State:	45CSR13	Construction/modification permits
	45CSR30	Operating permit requirement.
State Only:	None	

Each State and Federally-enforceable condition of the Title V Operating Permit references the specific relevant requirements of 45CSR30 or the applicable requirement upon which it is based. Any condition of the Title V permit that is enforceable by the State but is not Federally-enforceable is identified in the Title V permit as such.

The Secretary's authority to require standards under 40 C.F.R. Part 60 (NSPS), 40 C.F.R. Part 61 (NESHAPs), and 40 C.F.R. Part 63 (NESHAPs MACT) is provided in West Virginia Code §§ 22-5-1 *et seq.*, 45CSR16, 45CSR34 and 45CSR30.

Active Permits/Consent Orders

Permit or Consent Order Number	Date of Issuance	Permit Determinations or Amendments That Affect the Permit (<i>if any</i>)
R13-0718G	November 22, 2019	

Conditions from this facility's Rule 13 permit(s) governing construction-related specifications and timing requirements will not be included in the Title V Operating Permit but will remain independently enforceable under the applicable Rule 13 permit(s). All other conditions from this facility's Rule 13 permit(s) governing the source's operation and compliance have been incorporated into this Title V permit in accordance with the "General Requirement Comparison Table," which may be downloaded from DAQ's website.

Determinations and Justifications

1. **45CSR13 – Class I Administrative Update Permit No. R13-0718G.** The changes in the following table have been made in the operating permit based upon changes permitted in the underlying NSR permit. Note, however, that some changes in the underlying permit do not translate into a change in the operating permit.

R13-0718G	Title V	Discussion
1.0	1.1.	<p>The following changes have been made in the emission units table:</p> <ul style="list-style-type: none"> ▪ Source ID 042 (Raw Coal Stockpile 2) has been deleted. ▪ Source ID 048 (Lime Storage Silo 1) has been deleted. <p>The deletions also affect the following sections and conditions of the operating permit:</p> <ul style="list-style-type: none"> ▪ Table of Contents list of sources specified in Section 4.0. ▪ The heading of Section 4.0. ▪ Condition 4.1.11. list of affected sources. ▪ Condition 4.2.2. list of exceptions in the first paragraph for 042 and list of affected sources for 048.
2.4.1.	None	With this modification, the Title V permit contains the applicable requirements of permit R13-0718G as specified in Section 1.2 of the revised Title V permit; therefore, no permit condition is warranted for this requirement.
2.5.1.	4.1.7.	The permit condition has been revised.
3.5.3.	3.5.3.	The permit condition has been revised.
4.1.14.	4.1.15.	No changes were made to the content of the underlying requirement. Only the citation of authority in the underlying permit was changed from 45CSR§13-5.11 to 45CSR§13-5.10 due to removing section 5.8 of 45CSR13, effective June 1, 2017. However, the operating permit does not cite this section of 45CSR13; therefore, no change is required in the operating permit.

R13-0718G	Title V	Discussion
4.1.21.	4.1.9.	<p>There are no changes to the applicability of this requirement. However, the NSR permit identifies the affected sources differently than the current Title V permit. The list of affected sources has been revised to reflect the underlying permit.</p> <p>The NSR permit lists CB10, while the current Title V permit does not. However, Conveyor CB10 is identified by Source ID 022, which is listed in the current Title V permit. To reflect the NSR permit, Source ID 022 has been stricken and Conveyor CB10 has been added.</p> <p>Similarly, the NSR permit lists RLB, which is the Refuse Loadout Bin 1, identified with Source ID 024 in the current Title V permit. To reflect the NSR permit, RLB has been added and Source ID 024 has been stricken.</p>
4.2.4.	4.2.2.	In current Title V permit condition 4.2.2.a. the requirement to perform an initial Method 9 visible emissions evaluation within ninety (90) days of permit issuance has been deleted. Subsequent condition letters have been revised.
4.3.4.	4.3.4.	There are no changes to the applicability of this requirement. However, the NSR permit identifies the affected sources differently than the current Title V permit. The list of affected sources has been revised to reflect the underlying permit.
4.5.3.	4.5.4.	The underlying permit has been changed from “Associate Director – Office of Enforcement and Permit Review (3AP12)” to “Section Chief – Enforcement and Compliance Assurance Division Air Section (3ED21)”. However, current Title V permit condition 4.5.4. states only to submit to US EPA and then refers to the address in condition 3.5.3. Since condition 3.5.3. is being revised as part of this modification to specify the updated name and address, no change is necessary in permit condition 4.5.4.

Non-Applicability Determinations

The following requirements have been determined not to be applicable to the subject facility due to the following: None

Request for Variances or Alternatives

None.

Insignificant Activities

Insignificant emission unit(s) and activities are identified in the Title V application.

Comment Period

Beginning Date: Not Applicable for minor modifications.
Ending Date: N/A

Point of Contact

All written comments should be addressed to the following individual and office:

Denton B. McDerment, PE
West Virginia Department of Environmental Protection
Division of Air Quality
601 57th Street SE
Charleston, WV 25304
Phone: 304/926-0499 ext. 1221 • Fax: 304/926-0478
denton.b.mcderment@wv.gov

Procedure for Requesting Public Hearing

During the public comment period, any interested person may submit written comments on the draft permit and may request a public hearing, if no public hearing has already been scheduled. A request for public hearing shall be in writing and shall state the nature of the issues proposed to be raised in the hearing. The Secretary shall grant such a request for a hearing if he/she concludes that a public hearing is appropriate. Any public hearing shall be held in the general area in which the facility is located.

Response to Comments (Statement of Basis)

No comments were received from U.S. EPA regarding the proposed permit.